

EXHIBIT E

<p style="text-align: right;">Page 9</p> <p>1 A. Yes.</p> <p>2 Q. All right. Have you ever had your deposition</p> <p>3 taken before?</p> <p>4 A. No.</p> <p>5 Q. What's going to happen is, I'm going to ask</p> <p>6 you a bunch of questions. I'm hoping that you'll</p> <p>7 answer them. And then there may be times throughout</p> <p>8 the day where your attorney, Mr. Mike Matula, may</p> <p>9 interject and he will have, you know, something to</p> <p>10 say. He'll say it on the record. And then either</p> <p>11 he or I will instruct you to answer.</p> <p>12 If he instructs you not to answer, we may have</p> <p>13 additional conversations about that. But I just</p> <p>14 want to make sure you understand the logistics of</p> <p>15 how this goes?</p> <p>16 In addition, there is a court reporter who is</p> <p>17 recording everything that's being said as well as</p> <p>18 the video itself is being recorded. Do you</p> <p>19 understand all of that?</p> <p>20 A. Yes.</p> <p>21 Q. All right. I do have some documents to show</p> <p>22 you at some point. There is a feature here that</p> <p>23 allows me to display them on the screen that you're</p> <p>24 looking at. My ask is that you let me know if you</p> <p>25 can't see those documents and also that if there's</p>	<p style="text-align: right;">Page 11</p> <p>1 A. A write-up that I had received in, I believe,</p> <p>2 2019, and there was a log showing access to a record</p> <p>3 on the MOCIS system.</p> <p>4 Q. The log that you reviewed, did it have black</p> <p>5 lines through it like it had been crossed out?</p> <p>6 A. I didn't notice, if so.</p> <p>7 Q. I want to talk a little bit more about the</p> <p>8 role that you're in now versus the director of</p> <p>9 nursing role that you were in. Let's start with the</p> <p>10 timeline. When did you become the director of</p> <p>11 nursing?</p> <p>12 A. In July of 2018.</p> <p>13 Q. Was that your start date with Corizon?</p> <p>14 A. My original start date was with CMS in 2006</p> <p>15 and then I left the company -- it turned into</p> <p>16 Corizon, though, when the companies merged. And</p> <p>17 then I left in 2017 for several months. And then I</p> <p>18 came back as DON in July of '18.</p> <p>19 Q. So your most recent stint of employment</p> <p>20 started in July of 2018; is that accurate?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And you were hired directly to be the</p> <p>23 director of nursing; is that accurate?</p> <p>24 A. Yes.</p> <p>25 Q. What does CMS stand for?</p>
<p style="text-align: right;">Page 10</p> <p>1 any confusion about what's there, that we just take</p> <p>2 the time to get the documents squared away. Do you</p> <p>3 understand that?</p> <p>4 A. I do.</p> <p>5 Q. Okay. Who do you work for?</p> <p>6 A. Corizon Healthcare.</p> <p>7 Q. And what do you do for Corizon Healthcare?</p> <p>8 A. I'm a staff nurse, a registered nurse.</p> <p>9 Q. Is your title staff nurse?</p> <p>10 A. Yes. I used to be director of nursing, but</p> <p>11 then I went to PRN and now I'm a staff nurse full</p> <p>12 time. Well, 36 hours a week.</p> <p>13 Q. Okay. Let me ask you this first. What did</p> <p>14 you do to prepare for today's deposition?</p> <p>15 A. Well, I had a discussion yesterday with the</p> <p>16 attorneys from Ogletree Deakins.</p> <p>17 MR. NUGENT: To clarify, I believe that</p> <p>18 Ms. Christopher said she had conversations with</p> <p>19 attorneys from Ogletree Deakins.</p> <p>20 Q. (By Mr. Nugent) Tammie, I don't want you to</p> <p>21 tell me anything that you and your attorneys talked</p> <p>22 about. What I do want to know, though, is, did you</p> <p>23 review any documents in preparing for today?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. What documents did you look at?</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Correctional Medical Services.</p> <p>2 Q. And is that a previous name of Corizon or is</p> <p>3 that a different company altogether?</p> <p>4 A. I believe that CMS merged with another company</p> <p>5 and formed Corizon Health at some point years ago.</p> <p>6 I don't remember exactly when or what other company</p> <p>7 it merged with.</p> <p>8 Q. Okay. And when did you stop being the</p> <p>9 director of nursing?</p> <p>10 A. July of 2019.</p> <p>11 Q. And why did you stop being the director of</p> <p>12 nursing?</p> <p>13 A. The stress with management. I went to work at</p> <p>14 a local hospital for a while and stayed PRN with</p> <p>15 Corizon.</p> <p>16 Q. Okay. Are you still employed by Corizon now?</p> <p>17 A. Yes.</p> <p>18 Q. And are you PRN status now?</p> <p>19 A. No. I'm actually 36 hours a week every week</p> <p>20 now.</p> <p>21 Q. And your title, I believe, is staff nurse?</p> <p>22 A. Registered nurse, yeah.</p> <p>23 Q. Okay. And so in July of '19 you stepped down</p> <p>24 as the director of nursing. Did you immediately go</p> <p>25 into PRN status?</p>

<p style="text-align: right;">Page 17</p> <p>1 Q. Were you also -- or was a part of your job</p> <p>2 duty to reprimand the nurses that you supervised, if</p> <p>3 warranted?</p> <p>4 A. Yes.</p> <p>5 Q. What are the services that Corizon provides at</p> <p>6 Chillicothe?</p> <p>7 A. Provide healthcare to the offender population.</p> <p>8 Q. Okay. And with regards to the healthcare,</p> <p>9 does that include medical care?</p> <p>10 A. Yes.</p> <p>11 Q. Does it include dental care?</p> <p>12 A. Yes.</p> <p>13 Q. And does it include mental healthcare?</p> <p>14 A. They're in a separate building. But, yes,</p> <p>15 Corizon provides mental healthcare as well.</p> <p>16 Q. Okay. Are there any other types of medical</p> <p>17 services that Corizon provides at Chillicothe?</p> <p>18 A. We have optometry come in sometimes. We do</p> <p>19 X-ray and lab, but that's part of medical care. So</p> <p>20 I'm not sure.</p> <p>21 Q. You mentioned that mental health is in a</p> <p>22 different building. What is in the building that</p> <p>23 houses the dental and medical care?</p> <p>24 A. Everything except mental health.</p> <p>25 Q. Okay. Are the dental providers and the</p>	<p style="text-align: right;">Page 19</p> <p>1 medical.</p> <p>2 Q. All right. So the portion of the facility</p> <p>3 where an inmate might go to receive dental care or</p> <p>4 to receive medical care is the same portion of the</p> <p>5 facility?</p> <p>6 A. Yes.</p> <p>7 Q. When you were the director of nursing from</p> <p>8 July of '18 to July of '19, were you responsible for</p> <p>9 supervising Terri LaBlance?</p> <p>10 A. No.</p> <p>11 Q. Okay. Did you report to Terri?</p> <p>12 A. No. My immediate supervisor was Sterling</p> <p>13 Ream.</p> <p>14 Q. And what was her title while you were the</p> <p>15 director of nursing?</p> <p>16 A. Health services administrator.</p> <p>17 Q. Do you know who Terri LaBlance reported to?</p> <p>18 A. I believe clinically it would have been the</p> <p>19 collaborating physician.</p> <p>20 Q. Okay. Was your position as director of</p> <p>21 nursing, did you view that as a management position?</p> <p>22 A. Yes. It's considered site management.</p> <p>23 Q. When you started July -- when you started in</p> <p>24 July of 2018, did you receive the harassment policy?</p> <p>25 A. I'm sure I did.</p>
<p style="text-align: right;">Page 18</p> <p>1 medical providers in the same portion of the</p> <p>2 facility there in Chillicothe?</p> <p>3 A. Yes.</p> <p>4 Q. So to say it a different way, do you see</p> <p>5 regularly the dental -- the folks that provide</p> <p>6 dental care to the inmates?</p> <p>7 A. They work in the same building, yes.</p> <p>8 Q. Okay. What about the same wing or hallway of</p> <p>9 the building?</p> <p>10 A. Yes. They are in the back of the -- we call</p> <p>11 it the clinical side of the hallway.</p> <p>12 Q. So all of the Corizon employees who provide</p> <p>13 medical care, do they all report to the same wing</p> <p>14 and do their jobs in the same portion of the</p> <p>15 facility?</p> <p>16 A. I mean, they may have separate offices but in</p> <p>17 the same building.</p> <p>18 Q. Okay.</p> <p>19 A. We do have a nurse that will go to ad seg or,</p> <p>20 you know, things like that, but they all are based</p> <p>21 out of that building.</p> <p>22 Q. When you say you have a nurse that'll go to</p> <p>23 ad seg, tell me what ad seg is.</p> <p>24 A. Segregation. It's a different housing unit</p> <p>25 where the offenders aren't able to come up to</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Have you ever had to do an investigation into</p> <p>2 workplace harassment or discrimination?</p> <p>3 A. No. I'd just report it to an immediate</p> <p>4 supervisor if there was any concerns.</p> <p>5 Q. Okay. So if a concern -- let me ask a</p> <p>6 different way. Have concerns about workplace</p> <p>7 harassment or discrimination been brought to you?</p> <p>8 A. Not that I recall, no.</p> <p>9 Q. I want to go back to the logistics of the</p> <p>10 medical center. Do you interact with the dental</p> <p>11 staff?</p> <p>12 A. When I would do rounds. If I would walk</p> <p>13 around the building in the morning, I would pop in</p> <p>14 and say hi and see how it was going. Otherwise,</p> <p>15 they may come into our office and visit or talk.</p> <p>16 Q. Is that pretty common?</p> <p>17 A. I mean, yeah. People are in and out all day</p> <p>18 long.</p> <p>19 Q. Okay. Do you know Kelley Chapman?</p> <p>20 A. Doesn't ring a bell.</p> <p>21 Q. I want to talk a little bit about Terri</p> <p>22 LaBlance. During your time as director of nursing,</p> <p>23 were there any other African Americans employed by</p> <p>24 Corizon? And let me clarify the question. Were</p> <p>25 there any other African Americans employed by</p>

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<p style="text-align: right;">Page 21</p> <p>1 Corizon at the Chillicothe facility?</p> <p>2 A. Not that I recall.</p> <p>3 Q. Okay. Are there any African Americans that</p> <p>4 work for Corizon at the Chillicothe facility now?</p> <p>5 A. I don't believe so.</p> <p>6 Q. I want to ask you if you are familiar with a</p> <p>7 few events in, I believe, August or September of</p> <p>8 2017. There was a racial slur used by an employee</p> <p>9 of Corizon in a conversation with Ms. LaBlance. Are</p> <p>10 you familiar with that set of facts as I've</p> <p>11 explained them?</p> <p>12 A. I heard about it second or thirdhand. I</p> <p>13 wasn't there for -- I was at work that day, I</p> <p>14 believe, but I didn't witness it.</p> <p>15 Q. Okay. And that would have been in 2017. Were</p> <p>16 you employed by Corizon in 2017?</p> <p>17 A. I believe I didn't leave until September of</p> <p>18 '17.</p> <p>19 Q. Do you recall whether you were interviewed by</p> <p>20 anyone from human resources about the racial slur</p> <p>21 that I just referenced?</p> <p>22 A. I wasn't, but I didn't witness it.</p> <p>23 Q. Do you recall who told you about the racial</p> <p>24 slur?</p> <p>25 A. I don't. I think I heard it in the lunchroom</p>	<p style="text-align: right;">Page 23</p> <p>1 like, personally.</p> <p>2 Q. You know of him; is that right?</p> <p>3 A. Yes, I know of him.</p> <p>4 Q. Okay. Do you know of a Nicholas Koenig?</p> <p>5 A. Yes.</p> <p>6 Q. What about April Wolf?</p> <p>7 A. I believe she's an officer as well.</p> <p>8 Q. Dustin Lybarger?</p> <p>9 A. He's an officer as well.</p> <p>10 Q. Bradley Richards?</p> <p>11 A. I think he's a correctional officer as well.</p> <p>12 Q. Jeff Parque? (Phonetic on name.)</p> <p>13 A. Yes. I think he's a correctional officer as</p> <p>14 well.</p> <p>15 Q. Mindy Rhodes?</p> <p>16 A. Yes. She's a correctional officer.</p> <p>17 Q. Okay. And Phillip Bower?</p> <p>18 A. Yes. I believe he is or was an officer.</p> <p>19 Q. Of all of those names, are any of them --</p> <p>20 would you consider any of them friends?</p> <p>21 A. I mean, nobody I talk to outside of work.</p> <p>22 Might have been in passing.</p> <p>23 Q. So none of those names are individuals that</p> <p>24 you socialize with outside of work?</p> <p>25 A. I believe Parque was in a fantasy football</p>
<p style="text-align: right;">Page 22</p> <p>1 because someone had reported it.</p> <p>2 Q. When you say you heard it in the lunchroom,</p> <p>3 were there other people talking about what had</p> <p>4 happened?</p> <p>5 A. Somebody told me in there. I don't remember.</p> <p>6 Q. What was your response?</p> <p>7 A. I was shocked.</p> <p>8 Q. Did you do anything after learning about the</p> <p>9 slur?</p> <p>10 A. I know that Sterling reported it as soon as</p> <p>11 she heard about it, so I knew that it was taken care</p> <p>12 of. And I don't believe the other employee came</p> <p>13 back after that day. I believe she was terminated,</p> <p>14 but I'm not sure. I wasn't in a management position</p> <p>15 at that time to know exactly what happened.</p> <p>16 Q. All right. In your answer did you identify a</p> <p>17 name, someone that you talked to?</p> <p>18 A. Sterling Ream reported it to management. She</p> <p>19 was the management at that time.</p> <p>20 Q. All right. I'm going to ask you if you know a</p> <p>21 list of names. And if you do, I'm going to ask you</p> <p>22 a few follow-ups with regards to the names. Okay?</p> <p>23 A. Okay.</p> <p>24 Q. Do you know Brandon Doss?</p> <p>25 A. I think he's an officer, but I don't know him,</p>	<p style="text-align: right;">Page 24</p> <p>1 league I was in at some point, but not like close</p> <p>2 friends, no.</p> <p>3 Q. Earlier you referenced a software system and I</p> <p>4 believe you called it MOCIS. Is MOCIS M-O-C-I-S?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Is that an acronym?</p> <p>7 A. I'm sure it is. I don't know exactly what it</p> <p>8 stands for.</p> <p>9 Q. Do you know what records are housed in the</p> <p>10 MOCIS software system?</p> <p>11 A. I don't know all of them. I know the ones</p> <p>12 that we use in medical, but I don't know what</p> <p>13 anybody else would use.</p> <p>14 Q. All right. What do you all use -- in the</p> <p>15 medical department or, you know, in your day-to-day</p> <p>16 duties, what do you use the MOCIS system for?</p> <p>17 A. To document healthcare, look up information.</p> <p>18 Q. Do you know if all of the records in that</p> <p>19 system are HIPAA protected?</p> <p>20 MR. MATULA: Object to the form of the</p> <p>21 question. Go ahead, Tammie.</p> <p>22 A. I believe parts of it are. The health record.</p> <p>23 Q. (By Mr. Nugent) If I understand your</p> <p>24 testimony, parts of the records in the MOCIS system</p> <p>25 that you use are protected and parts are not; is</p>

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